2 3 4	CRAIG W. DRUMMOND, ESQ. Nevada Bar No. 011109 228 South Fourth St., First Floor Las Vegas, NV 89101 T: (702) 366-9966 F: (702) 508-9440 craig@drummondfirm.com
5	UNITED STATES DISTRICT COURT
6	DISTRICT OF NEVADA
7 8	UNITED STATES OF AMERICA,)
9	Plaintiff,) vs.) CASE NO. 2:11-cr-00379-GMN-CWH
10	DAVID TORRADO, DEFENDANT'S MOTION FOR A DEFENDANT'S MOTION FOR A
11	Defendant.) PRE-PLEA PRESENTENCE INVESTIGATION REPORT
12 13	COMES NOW, the Defendant by and through his appointed attorney of record, Craig W.
14	Drummond, Esq., and moves this Honorable Court to direct that a Pre-Plea Presentence Investigation
15	Report be prepared in this matter by the U.S. Probation Office.
16	This request is made for the following reasons:
17	1. The Defendant does have a prior criminal history and as such, he may be subject to
18	substantially different sentencing ranges based on his criminal history and other factors surrounding
19	the offenses and plea.
20	2. Defendant's decision regarding to plead or proceed to trial in this matter may be
21	significantly affected by his exposure in this regard.
22	3. This request is made so that Defendant may have the advice and assistance of effective
23	counsel reviewing his actual sentencing exposure based on his verified criminal history.
200	4. The preparation and review of the report in this matter will promote judicial economy and
24	aid in the matter which this case may be ultimately resolved.
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27	//
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CRAIG W. DRUMMOND

A Professional Corporation
228 South Fourth St., First Floor

WHEREFORE, the Defendant requests this Honorable Court Order that the U.S. Probation
Office prepare a Pre-Plea Presentence Investigation Report in this matter as soon as possible.
DATED this of March, 2013.

Respectfully Submitted,

REMIMOND, ESQ.

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CRAIG W. DRUMMOND

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the <u>//</u> day of March, 2013, the undersigned served the foregoing Defendant's Motion for Pre-Plea Presentence Investigation Report on all counsel herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order

Employee of CRAIG W. DRUMMOND, P.C.

IT IS SO ORDERED.

DATED: March 12, 2013

UNITED STATES MAGISTRATE JUDGE